

September 21, 2011

Growth Management Planning Council
King County DDES
900 Oakesdale Avenue SW
Renton, WA 98057-5212
Attn: Mr. Paul Reitnebach

Dear Members of the Growth Management Planning Council:

I live in Redmond and have four children in grades 6, 9, 11 and 12 who attend or have attended Lake Washington Schools. I have spent a lot of time volunteering in the schools and am familiar with the issues surrounding the locations of schools and how the school boundaries are closely related to transportation options, which, in turn, determine educational opportunities as well as hardships for many students.

I want to address the loop-hole that exists in the Comprehensive Plan that has allowed the Lake Washington School District and other school districts to build schools in rural areas that are used primarily by students who live inside the Urban Growth Boundary. The original intent of county planners may have been to allow rural schools to be built for rural students, and therefore, they did not outright prohibit the construction of schools in rural areas. However, it is now clear that school districts quickly recognized that rural land was cheaper and easier to acquire and purchased tracts outside the Urban Growth Boundary. It is confounding that while *everyone* - meaning residents, municipalities, utilities and public services all conformed to the intent of the Growth Management Act that concentrated development and services inside the Urban Growth Boundary, school districts felt that the same rules didn't apply to them and proceeded to acquire land and build schools outside the UGB in areas that weren't easily accessible to residents who lived inside the UGB. What were they thinking? The Lake Washington School District currently operates a number of schools far outside the Urban Growth Boundary in rural areas that are attended by a significant number of students from cities inside the UGB. They also hold a number of vacant parcels in rural areas that they have intended to use for specialty schools (referred to as "Choice" schools) that would be attended primarily by students from across the entire district.

If we look at Alcott Elementary, we see that the school does serve the rural students who live on the east side of the district. But most students who attend Alcott are bussed from inside the city limits of Redmond and Sammamish. The planned community of Woodbridge on the east edge of Redmond was completed in 2003 and has about 3,900 residents who live in single-family houses, townhomes, condos and apartments. Nearly 200 Kindergarten through 6th grade students are bussed from the Woodbridge neighborhood to Alcott Elementary every day. About 160 elementary students from along East Lake Sammamish Parkway and the Hidden Ridge Development inside the Sammamish city limits are bussed out to Alcott every day also. These students are bussed 3-4 miles and spend at least 20 minutes on the bus - with some students riding as long as 40 minutes on the way to school and on the way home. There is no Metro bus service to Alcott; the nearest bus stop is at Sahalee Way. There are no sidewalks or bike lanes along SR202 and biking or walking next to cars going 55 mph would be far too dangerous for elementary age students. Participating in after-school activities requires that a parent drive out and pick students up - or students without car transportation are simply excluded. There is a significant cost to Washington State taxpayers who must pay for bus transportation for nearly 400 students being bussed from inside the UGB. It also needs to be noted that Alcott is one the district's most overcrowded schools with 675 students in 24 classrooms and 6 portables. With Redmond Elementary less than 2 miles from Woodbridge and Blackwell Elementary less than a mile from East Lake Sammamish Parkway and the Hidden Ridge neighborhood, is there any justification for bussing these students out to Alcott in the rural part of the county?

Similarly, Evergreen Junior High, located near the corner of Union Hill Road and 208th Avenue NE, is in a very remote part of the district. Union Hill Road is so windy, steep and dangerous that district school busses will not use it and instead take a much longer route to the north. Junior high students from the high density housing along Avondale Road are bussed to EJH every day. Many of those students are low-income so their parent(s) or guardians may not have access to a car. There is no Metro bus service to Evergreen Junior High so when a student misses the bus, he or she will miss a whole day of school. Getting sick during the day means the student stays in the health room until the end of the day when the school bus takes students home. Attending before- and after-school activities or parent conferences is also a hardship for these students and their families.

There are also the traffic jams created by the parents who don't want their children riding the bus for 30-40 minutes each morning and afternoon who choose to drive them to and from school. There is an enormous waste of fuel as cars drive long distances to and from schools – usually twice each day. There is the enormous waste of time and an enormous output of greenhouse gases. I know that parents have complained that they don't want their children to be bussed long distances to school, but the district has been non-responsive.

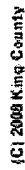
At the September 12, 2011 meeting of the Lake Washington School Board, concern was expressed by Superintendent Chip Kimball that changes to the 2012 King County Comprehensive Plan Update would result in the school district not being able to use the rural land that they already own, especially for their regional STEM School that is to be built on land next to Alcott Elementary. They noted the expense of having to acquire land inside the Urban Growth Boundary. The School Board seemed truly oblivious to the intent of the Growth Management Act that dictated that growth and supporting services should be built inside the Urban Growth Boundary. They could only focus on the loss of their connection to sewer service as a result of PF-12. The school district has never been sensitive to the inaccessibility of the Alcott and Evergreen areas and the transportation needs of its students or the expenses associated with transporting students long distances. The accompanying spreadsheet illustrates how Alcott Elementary and Evergreen Junior High have significantly higher annual transportation costs than comparable schools inside the Urban Growth Boundary. The higher transportation costs of operating a school in a rural area eventually will offset the lower land prices in rural areas and the transportation costs will continue to increase over time. It is hard to estimate the price of the hardship incurred by students who cannot walk or ride their bikes to a neighborhood school when it is located far off in a rural part of the county, but the cost is substantial.

Superintendent Kimball also stated that the Lake Washington School District is working with the Growth Management Planning Commission to secure a grandfather clause for its existing parcels of rural land. If the Council is committed to its Vision 2030 to concentrate growth within cities and leave rural areas open and natural, this exemption should not be granted. School are an integral part of many families' lives and school districts need to embrace this vision and locate urban schools in urban cities and in planned developments where people live and work. If school districts refuse to sign up to this plan, then they need to be forced to comply. School districts need to be held to the highest standards. They need to recognize that it is their paramount responsibility to act in the best interests of their students rather than in the best interests of the facilities department that has had nearly 20 years to plan for proper growth management. I urge the council to write their updated plan in a way that prohibits urban students from attending rural schools.

Sincerely,

Susan Wilkins

AVONDALE ROAD—Hundreds of Students from Avondale's High Density Housing are sent Evergreen Junior High



Office of the Superintendent of Public Instruction (OSPI) Transportation Reimbursement Allocation Formula Explanation for the Lake Washington School District 2010-2011

School districts are responsible for purchasing and maintaining their bus fleets or they may contract with independent bus services such as First Student. The school districts keep track of the number of students transported as well as the distance transported and then report the totals to the OSPI for reimbursement. The OSPI has used a complex, convoluted formula for reimbursing school districts for the cost of transporting students. The bus routes and reimbursement formulas for each district can be found on the OSPI website in Form 1025 and Form 1026-A. The format for the forms has been in use since 1997 and is cryptic, using school codes and serial numbers instead of school names and bus numbers and a complex formula that is poorly formatted.

For elementary students in grades 1 through 5, each school receives about \$62.00 per student if the student walks to school or is bussed less than 1 mile. For junior high and high school students, the school district receives no reimbursement if a student is bussed less than 1 mile to school.

For students in all grades, if the student is bussed more than 1 mile but less than 2 miles, the district receives \$311.68 for each student transported based on a formula and load factor that the OSPI determines for that school district. For the Lake Washington School District, the following reimbursement schedule applies for 2010-2011:

2010-2011 Reimbursement Bus Reimbursement Formula:

2 Miles	3 Miles	4 Miles	5 Miles	6 Miles	7 Miles	8 Miles	9 Miles
\$311.68	\$345.77	\$379.86	\$413.95	\$448.04	\$484.08	\$516.22	\$550.31

10 Miles	11 Miles	12 Miles	13 Miles	14 Miles	15 Miles	16 Miles	17 Miles
\$584.40	\$619.46	\$653.55	\$688.62	\$723.68	\$758.75	\$791.86	\$827.90

A new section in RCW 28A.160.160 effective September 1, 2011 will change the way that student travel distances are measured. Instead of measuring the straight-line distance that a student is transported from bus stop to school, the actual driving route will be measured and will increase the distance that the school district will be reimbursed for transporting the student. While the reimbursement rates may not increase, the distance that each student travels will increase, resulting a significantly higher reimbursement cost per student transported.

Note that when a student rides a Metro bus and uses a bus pass purchased and provided by the school district, the school district is reimbursed for the distance the student travels based on the above table although the bus pass costs about \$300. So if a student travels 6 miles to school using a Metro pass, the district collects \$448.08 from the OSPI. If the student travels 17 miles to school, the district collects \$827.90 from the OSPI.

2010-2011 COST COMPARISON FOR LAKE WASHINGTON SCHOOLS (from OSPI Form 1025 & 1026-A)

Rte	School	Schl #	Bus #	Bus ID		1 Mile	2 Miles	3 Mi	4 Mi	5 Mi	6 Mi	Total
119	Evergreen Junior High	4148	149	205175	A		6		59	3		68
121	Evergreen Junior High	4148	153	205245	A			5	5	40		50
125	Evergreen Junior High	4148	96	18899	A				48	10		58
129	Evergreen Junior High	4148	166	205202	A		15	28				43
131	Evergreen Junior High	4148	132	203935	A	2	26	15	2			45
135	Evergreen Junior High	4148	90	19689	A		18	5	15			38
139	Evergreen Junior High	4148	85	18053	A		54					54
143	Evergreen Junior High	4148	146	204044	A		47					47
147	Evergreen Junior High	4148	141	204007	A		7	42				49
149	Evergreen Junior High	4148	158	205187	A		44	2				46
						2	217	97	129	53	0	498
Evergreen Jr High						\$0	\$311.68	\$345.77	\$379.86	\$413.95		
771 Students							\$67,635	\$33,540	\$49,002	\$21,939		
498 Transported by bus												
\$172,115.54						Total cost to to transport students more than 1 mile to school						

93	Redmond Junior High	3232	79	205795	A				50	10		60
96	Redmond Junior High	3232	148	205174	A			7	54			61
99	Redmond Junior High	3232	165	205201	A	13	22					35
105	Redmond Junior High	3232	162	205247	A		37					37
108	Redmond Junior High	3232	98	20057	A		26	17				43
						13	85	24	104	10	0	236
Redmond Jr High						\$0	\$311.68	\$345.77	\$379.86	\$413.95		
892 Students							\$26,493	\$8,298	\$39,505	\$4,140	0	
236 Transported by bus												
\$78,436.22						Total cost to to transport students more than 1 mile to school						

74	Rockwell Elementary	4147	134	204000	A	33	32					65
100	Rockwell Elementary	4147	165	205201	A	46	22					68
216	Rockwell Elementary	4147	82	19681	A	40	29					69
316	Rockwell Elementary	4147	72	206475	A	7	1					8
331	Rockwell Elementary	4147	21	20524	A		7					7
						126	91	0	0	0	0	217
Rockwell Elementary						\$62.00*	\$311.68					
605 Students						\$31,868	\$28,363					
236 Transported by bus												
\$60,230.88						Total reimbursement to school for bus transportation						

Rte	School	Schl #	Bus #	Bus ID		1 Mile	2 Miles	3 Mi	4 Mi	5 Mi	6 Mi	Total
2	Alcott Elementary	4256	83	18055	A		41	37				78
7	Alcott Elementary	4256	83	205200	A		6	58	2			66
15	Alcott Elementary	4256		205251	B		32					32
47	Alcott Elementary	4256	126	21520	A			58	21			79
49	Alcott Elementary	4256	126	21520	A	5	3	3				11
54	Alcott Elementary	4256	125	14297	A			73				73
88	Alcott Elementary	4256		203934	S			30		11		41
91	Alcott Elementary	4256	94	19684	A	28	12					40
136	Alcott Elementary	4256	90	19689	A		42	8				50
						33	136	267	23	11	0	470
Alcott Elementary						\$62.00*	\$311.68	\$345.77	\$379.86	\$413.95		
675 Students							\$12,710	\$42,388	\$92,321	\$8,737	\$4,553	
470 Transported by bus												
\$160,709.30						Total reimbursement to school for bus transportation						

* Reimbursement rate for elementary students riding less than 1 mile to school or walking based on entire student population.